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Attorney for Defendant Edward Charles Green

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

EDWARD CHARLES GREEN,

Defendant.

No. 3:21-CR-00413-HZ-02

DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED MOTION
TO CONTINUE TRIAL DATE

I, James F. Halley, do declare under penalty of perjury under the laws of the United States that the following is true and correct:

1. I am a member of the Oregon State Bar and I am counsel for Edward Charles Green. I make this declaration in support of a motion for a 60 day continuance of the current March 22, 2022 trial date in this case.

2. I ask for this continuance to allow time to prepare a defense. Mr. Green was arrested on October 5, 2021 and had his first appearance on October 6, 2021 (CR 7). I was appointed as substitute counsel on October 8, 2021 (CR 11). The court held a detention hearing on October 25, 2021 and released Mr. Green on conditions (CR 24). To my knowledge, he is in full compliance with his release conditions.

3. The indictment accuses Edward Charles Green, along with his brother and codefendant, Thomas Edward Green, III of 41 counts of false statements during purchase of a firearm in violation of 18 U.S.C. § 922(a)(6) ranging from May 2020

through August 2021. I ask for a continuance so that I may have time to prepare a defense.

4. The prosecution sent volume 1 discovery on November 9, 2021, volume 2 on December 3, 2021, and volume 3 on March 3, 2022. I need additional time to complete my review of the discovery and to review it with Mr. Green and conduct follow-up investigation. I cannot effectively prepare a defense in time for the March 22, 2022 trial.

5. Mr. Green has been advised on his right pursuant to 18 U.S.C. §3161 to have a trial within 70 days of the date of the indictment, or his first appearance in court, whichever is later. He has agreed to waive those rights for the purpose of this request of for a continuance.

6. I have spoken to AUSA Parakram Singh about this motion. He does not object to it.

7. I understand that co-defendant Thomas Green has moved for a continuance of the March 22, 2022 trial date.

Respectfully submitted March 8, 2022

JAMES F. HALLEY, P.C.

/s/ James F. Halley

James F. Halley, OSB #911757

Attorney for Defendant Edward Charles Green